

Secure Records Destruction Guide

Metropolitan Government of
Nashville and Davidson County

Records Management Division
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TABLE OF CONTENTS

Metro’s Secure Records Destruction Service—Statement of Purpose.....	1
Service Overview.....	2
Types of Service.....	4
Identifying Appropriate Records for Secure Destruction.....	7
Registering for Service.....	10
Choosing a Level of Service.....	12
Appropriate Items for Containers.....	13
About the Richards & Richards Secure Shredding Operation.....	16
Frequently Asked Questions.....	20
Appendix A: Registration Form.....	22

Metro's Secure Records Destruction Service

— Statement of Purpose

Metro's secure records destruction service is available to all Metro departments and is Metro's approved method for destroying records containing confidential information.

Metro records are managed in accordance with applicable public records laws, and all records—whether confidential or not—must be destroyed only in accordance with records schedules approved by the Davidson County Public Records Commission.

Because there is a per-container and per-pound cost for this destruction service, the secure destruction service should not be used for general recycling.

Please contact Metro Records Management at 862-5885 with any questions about identifying confidential records, to discuss appropriate records schedules, or to register for this service.

Service Overview

This section provides a summary of the entire secure destruction service process. Additional details are provided in applicable sections of this booklet.

Registering for the Service

- Records Officer contacts Metro Records Management to register for service
- Records Officer completes a registration form (including security levels for one or more additional staff)
- Richards & Richards (R&R) and the Records Officer make contact to set up the desired service level

See page 10 for registration details.

Selecting a Level of Service

Service can include both on-site containers and bulk pick-up. R&R will help determine the level of service needed for the department or division.

Before talking with Richards & Richards, there are a number of questions you will want to be prepared to answer.

See page 12 for help with level of service preparation.

Understanding the Container Pick-up Process

- R&R staff arrives for scheduled pick-up
- Department staff with Full Access or Limited Access security shows an ID and signs the work order
- R&R staff removes the material for destruction
- R&R leaves a copy of the work order if the department requests one
- Locked containers are placed in the locked truck
- Material is transported to the R&R facility

See page 4 for additional details on types of service.

Understanding the Paper Destruction Process

- Material is placed in a pit at the R&R facility and pulled through the shredder
- Shredding is baled into 1200- to 1500-pound bales
- Bales are transferred to a paper mill in lots of 30
- Shredding is de-inked and processed into liquid form (pulp)

- Pulp is processed into recycled products

See page 16 for information on the Richards & Richards operation, including security.

Invoicing & Payment

- R&R generates a work order for each pick-up by location
- R&R generates one monthly invoice of all Metro pick-ups
- Metro Records Management matches individual work orders to the master invoice
- Metro Clerk's Office pays the invoices
- R&R sends a notarized certification of destruction to Metro Records Management
- Metro Records Management tracks the use and cost by department

Contact Metro Records Management at 862-5885 with any questions about cost, invoices, certificates of destruction, and volume tracking.

Types of Service

Two types of service can be ordered from Richards and Richards (R&R). Please note that, regardless of the type of service ordered, all destruction of records must be performed only in accordance with authorized records schedules.

- Bulk pick-up is available.

This service is useful during the periodic destruction of large volumes of records.

- Containers can be ordered and placed on-site in the department.

This service is best used when staff have a daily-to-monthly need to contain and destroy records with confidential information. This might include drafts and copies of documents, or routine destruction of records.

Bulk Pick-Up Services

Bulk pick-up services are available and must be scheduled in advance. For boxed records, the minimum requirement is for a volume of 10 or more boxes. If destruction is for unboxed records, such as those in file folders, Richards & Richards can deliver 96-gallon containers. Files can be placed directly in the containers, eliminating the need to box the files.

Bulk pick-up services are useful during the periodic destruction of large volumes of records. When using bulk pick-up services, paper and other media must not be mixed within one box or container.

Contact Richards & Richards at 242-9600 with any questions about bulk pick-up services.

On-Site Containers

Richards & Richards provides two types of containers for use on-site. Either of the containers described here can be ordered for paper containment and destruction, or non-paper media containment and destruction (such as video tapes, computer discs, microfiche, and such). Please note, however, that paper and non-paper media cannot be mixed within the same container.

Executive Security Container

Richards & Richards' Executive Security Container (Fig. 1) holds approximately the contents of three cubic foot boxes, or, approximately 3.5 feet of letter-size files. The dimensions and other details follow.



Figure 1. Executive Security Container

- The dimensions are 41" H x 19" W x 19" D.
- The container has a secure opening in the front to deposit confidential information.
- The work surface on the top is available to be utilized with other office equipment (such as a printer).
- This container holds up to 100 pounds.

96-Gallon Security Container

Richards & Richards' 96-Gallon Security Container (Fig. 2) holds approximately the contents of ten cubic foot boxes, or, approximately 12.5 feet of letter-size files. The dimensions and other details follow.



Figure 2. 96-Gallon Security Container

- The 96-Gallon container is dark gray.
- The dimensions are 43”H x 35”D x 24”W.
- This container has wheels, which makes for convenient moving.
- The 96-gallon security container can hold approximately 250 pounds.

Contact Richards & Richards at 242-9600 with any questions about on-site container services.

Identifying Appropriate Records for Secure Destruction

Metro's secure destruction service is to be used only for records containing confidential information.

The following list, developed by the Metro Legal Department,¹ identifies records not open for inspection under public records acts. The confidential records and information referred to on this list should be disposed of using the Richards & Richards secure destruction services contract.

Please note that the secure destruction service is provided at a cost to Metro, so it is not to be used for general recycling.

Contact Metro Records Management at 862-5885 with any questions about identifying confidential information, or about the application of records schedules to your records.

1. Medical records of patients in state, county and municipal hospitals and medical facilities, and the medical records of persons receiving medical treatment.
2. Records, documents and papers in the possession of the military department which involve the security of the United States and/or the state of Tennessee.
3. Records of students in public educational institutions.
4. Official health certificates, collected and maintained by the state veterinarian pursuant to rule chapter 0080-2-1 of the department of agriculture.
5. Personal information contained in motor vehicle records.
6. All memoranda, work notes or products, case files and communications related to mental health intervention techniques conducted by mental health professionals in a group setting to provide job-related critical incident counseling and therapy to law enforcement officers, emergency medical technicians, emergency medical technician-paramedics, and firefighters, both volunteer and professional, are confidential and privileged and are not subject to disclosure in any judicial or administrative proceeding unless all parties waive such privilege. In order for such privilege to apply, the incident counseling and/or therapy shall be conducted by a qualified mental health professional as defined in § 33-10-101(18).
7. All riot, escape and emergency transport plans which are incorporated

¹ September 23, 2002

- in a policy and procedures manual of county jails and workhouses or prisons operated by the department of correction or under private contract.
8. The telephone number, address and any other information which could be used to locate the whereabouts of a domestic violence shelter or rape crisis center.
 9. The credit card numbers of persons doing business with the state or political subdivision thereof and any related Personal Identification Numbers (PIN) or authorization codes.
 10. Records that would allow a person to identify areas of structural or operational vulnerability of a utility service provider or that would permit unlawful disruption to, or interference with, the services provided by a utility service provider.
 11. Contingency plans of a governmental entity prepared to respond to or prevent any violent incident, bomb threat, ongoing act of violence at a school or business, ongoing act of violence at a place of public gathering, threat involving a weapon of mass destruction, or terrorist incident.
 12. The private records of any utility shall be treated as confidential and shall not be open for inspection by members of the public. "Private Records" means a credit card number, social security number, tax identification number, financial institution account number, burglar alarm codes, security codes, and access codes.
 13. Records of any employee's identity, diagnosis, treatment, or referral for treatment that are maintained by any state or local government employee assistance program.
 14. Unpublished telephone numbers in the possession of emergency communications districts.
 15. Records or information of any state, county, municipal or other public employee in the possession of a governmental entity in its capacity as an employer: unpublished telephone numbers; bank account information; social security number; driver license information except where driving or operating a vehicle is part of the employee's job description or job duties or incidental to the performance of the employee's job; and the same information of immediate family members or household members.
 16. Personnel information of any police officer designated as working undercover

may be segregated and maintained in the office of the chief law enforcement officer.

17. Information that would allow a person to obtain unauthorized access to confidential information or to government property:
 - a. Plans, security codes, passwords, combinations, or computer programs used to protect electronic information and government property;
 - b. Information that would identify those areas of structural or operational vulnerability that would permit unlawful disruption to, or interference with, the services provided by a governmental entity; and
 - c. Information that could be used to disrupt, interfere with, or gain unauthorized access to electronic information or government property.

Registering for Service

A department may contact Richards & Richards to set up secure destruction services as soon as the Record Officer completes the registration process.

- The Records Officer must sign the registration form, and automatically has Full Assess security.
- The only departmental staff who may sign work orders are those listed on a valid registration form as having a Full-Access or Limited-Access security.
- A department must have at least one authorized back-up to sign work orders.

A blank registration form is available as Appendix A at the end of this guide.

Registration Instructions

1. The department's Records Officer contacts Metro Records Management at 862-5885 to initiate service for the department.
2. The Records Officer completes one registration form for each location for which service is desired.
3. The Records Officer signs the registration forms as the department's main contact.
4. The Records Officer works with the department to choose one or more additional staff to designate with the appropriate security level.

Full-Access Security A departmental employee whose name is listed on the registration form with Full Access will be able to order any and all services such as more security containers or more/less pick-ups, or to schedule a bulk pick-up.

Limited-Access Security Any departmental employee whose name is on the registration form with Limited Access will be able to sign the work order when an R & R driver is servicing the department. ***Persons with Limited Access are not authorized to call and request any services.***

Adds/Deletes/Changes The Records Officer must sign any additional registration forms that are submitted to add, delete, or change names for security access purposes, or to add a new location for service.

5. Fax the completed registration form to Metro Records Management at 862-5886.

6. Metro Records Management verifies the Records Officer's name and reviews the information.
7. Metro Records Management faxes the completed form to R&R.
8. R&R contacts the Records Officer to determine the level of service.
9. R&R delivers containers and makes pick-ups as agreed.
10. The Records Officer is responsible for keeping the registration form, including the security list, up-to-date.
11. Metro Records Management reviews registration forms periodically to assure outdated security information is being updated.

Contact Metro Records Management at 862-5885 with any questions about registration.

Choosing a Level of Service

Once you have registered for the secure destruction service with Metro Records Management, you may set up the desired level of service with Richards & Richards.

Before calling Richards & Richards, you may want to prepare by thinking through the following list of questions they are likely to ask. Service is set up by location, so you will need to answer the following for each location that will be serviced.

- Address of the location for which you need service—street, building, floor, & suite
- Phone and fax numbers at the location
- Verification of requestor—*the person requesting the service must be registered with Full Access security*
- Type of service needed—on-site containers, bulk pick-up, or both
- If containers are needed:
 - Type of container(s)
 - Number of each type of container
 - Whether the information you want to destroy is paper or non-paper media
 - If non-paper media, list the types of media you want to have destroyed
 - How often the container(s) need to be picked up (weekly, every other week, monthly, call-in)
- If this is a bulk pick-up:
 - How are the records stored (boxes, loose papers, files in cabinets)
 - The approximate volume (number of boxes, number of file drawers)
 - If these are boxes, are they on pallets
 - Is this a one-time or regularly scheduled pick up
- Facility information:
 - Is there a loading dock
 - Are there stairs, and, if so, how many flights
 - Is there a freight elevator
 - Is there a customer elevator

Contact Richards & Richards at 242-9600 when you are ready to set up service.

Appropriate Items for Containers

When using Richards & Richards' secure, lockable containers, you will need to determine what can, and must not, be placed in the containers for destruction. These guidelines must also be followed when using the service for bulk destruction.

- Table 1 (Content Limitations for Secure Paper Containers) provides details for appropriate and inappropriate items of paper-only containers.
- Table 2 (Content Limitations for Secure Non-Paper Media Containers) provides details for appropriate and inappropriate use of non-paper media containers.

See page 7 for information on identifying confidential information for secure destruction.

Content Limitations for Secure Paper Containers	
Items Allowed	Items NOT Allowed
ACCO Fasteners Brochures Checks Computer Printouts Invoices Mailing Envelopes Manila Folders Office Paper (all, including colors) Paperclips Ring Binders Staples	Batteries Bio-hazardous Material Cans Carbon Paper Cereal Boxes Computer Parts* Corrugated Paper Electronics (for example: scanners, circuit boards)* Food Items (such as mustard and ketchup)** Food Wrappers ** Kleenex Tissues Hardback Books Leather Products Paper Bags Paper Cups & Plates ** Paper Towels Plastic* Scrap Metal Shredded Paper Styrofoam Cups Toner Cartridges* Transparencies*
<p>* Plastic, magnetic, and electronic media can not be placed in the paper destruction security containers. Computer parts and computer equipment are not accepted.</p> <p>** Food contaminates shredded paper bales and causes the bales not to be recyclable.</p>	

Table 1. Content Limitations for Secure Paper Containers

Content Limitations for Secure Non-Paper Media Containers	
Items Allowed	Items NOT Allowed
ACCO Fasteners Cassettes CDs Computer Reels Computer Tapes DVDs Electronic Media (all) Floppy Discs Magnetic Media (all) Microfiche Microfilm Paper clips Plastic Report Covers Staples Tapes Transparencies VHS Tapes	Batteries Bio-hazardous Material Boxes of Checks Brochures Cans Carbon Paper Cereal Computer Parts* Computer Printouts Corrugated Paper Electronics (for example, Scanners and Circuits Boards)* Food Items Food Wrappers Hardback Books Kleenex Tissues Leather Products Office Paper (all) Paper Bags Paper Cups and Plates Paper Towels Scrap Metal Shredded Paper Styrofoam Cups Toner Cartridges*
* Computer parts and computer equipment are not accepted.	

Table 2. Content Limitations for Secure Non-Paper Media Containers

About the Richards & Richards Secure Shredding Operation

Background

Established in 1987, Richards & Richards is a full-service commercial records management company, servicing approximately 1200 customers. They have the ability to confidentially shred 16,000 lbs. of paper in one hour.

Richards & Richards is active in many local and national records management organizations, such as the National Association for Information Destruction (NAID), the Association of Records Managers and Administrators (ARMA), and Professional Records and Information Services Management (PRISM).

A strict chain of custody is maintained by Richards & Richards over paper from the time it is picked up, through interim shredding and baling, and through de-inking and processing into liquid form (pulp) at a paper mill. The pulp is recycled into paper products such as paper towels and toilet tissue.

Richards & Richards also shreds non-paper media such as CDs, DVDs, microfiche, microfilm, and VHS tapes. Microfiche is destroyed using a crosscut shredder, to insure safe destruction. Non-paper media is shredded and taken to an appropriate landfill, as there is no viable way to recycle non-paper media in Nashville at this time.

Richards & Richards provides two sizes of secure, locked containers for daily office use. Materials are transported in locked trucks and the vehicles are tracked through a live GPS system. The shredders used to provide this service are housed at their Harding Industrial Road facility. They guarantee paper and non-paper media are shredded within 24 hours of delivery. All material placed on a shredder is processed by the end of the workday, with no material left loose overnight.

Metro Records Management receives a notarized Certificate of Destruction for all materials destroyed.

Richards & Richards will provide pre-scheduled tours for department representatives who would like to view their operation.

Contact Richards & Richards Customer Service at (615) 242-9600 or orders@richardsandrichards.com with any questions about security, containers, equipment, and delivery and pick-up procedures. The Richards & Richards Web site may be found at <http://www.richardsandrichards.com>.

Security Overview

The Richards & Richards company was selected to provide secure destruction services to Metro government because of their security and quality of service. Richards & Richards provides a strict start-to-finish chain of custody for confidential materials. Following are some important points you may want to know about Richards & Richards' security.

Departmental Security Levels

Not everyone in a Metro department may order secure destruction services or sign work orders. Richards & Richards provides for two levels of security—Full Access and Limited Access. When a department registers for service, a limited number of individuals are designated with one or the other access levels. This limits the number of people who are authorized to register for service, sign work orders, or change service levels.

Delivery and Pick-Up

Richards & Richards' (R&R) drivers will pick up confidential material for destruction in a Metro department only when a departmental employee signs the work order. This employee must be listed on the registration form with either Full Access or Limited Access security, and must show an ID.

Drivers

All R&R drivers will be wearing a company uniform and displaying a photo ID. Each driver, as a condition of employment, was submitted to a thorough background check through Kroll/Background America, and has signed a confidentiality agreement with R&R stating that they will at no time divulge the name of R&R clients to anyone else, or discuss what they see. Additionally, as a condition of employment, each employee has signed an employment agreement with R&R.

GPS

Each R&R delivery vehicle has a Global Positioning System (GPS) unit that will identify detailed information about each vehicle. Information available through this technology includes where the vehicle has been, how fast it is moving, what time it arrives at a destination, how long it stays at the destination, and several other options. R&R verifies each delivery and monitors the activity of each delivery throughout the day. In the event of an emergency, R&R will know exactly where all equipment is.

Facility

The internal security system at the R&R facility is monitored by ADS Security and Control on a 24-hour basis for both perimeter and interior protection. ADS is Nashville's

only UL listed security company. The R&R facility utilizes motion, sound, infrared, door strikes, glass breaks, beams and other security options offered by R&R's security company. Fire protection is provided by ATS on a 24-hour basis.

Shredding Equipment



Figure 3. Shredding paper on “The Big Hurt.”

Richards & Richards' paper shredder is a 125 horsepower Ameri-Shred industrial shredder. It is likely the largest paper shredder south of Philadelphia and east of Salt Lake City, Utah, having the capability to shred 16,000 pounds of paper an hour.



Figure 4. Baling the shredded paper.

Richards & Richards' automatic paper baler converts loose paper shredding into 1200- to 1500-pound bales. When 30 bales have accumulated, the bales are sent to a paper mill and run through a process to de-ink and liquefy (pulp) the paper.



Figure 5. "OB the Obliterator" is used to shred non-paper media.

This shredder is used to shred all forms of magnetic and electronic media, including diskettes, computer tapes, audio cassettes, CDs, VCR tapes, film, x-rays, and more.

Microfiche is destroyed with crosscut shredding on an Intimus Shredder.

Frequently Asked Questions

1. What size is the shred width?

The shred width is the national standard of 5/8 inch. Because the paper is sent to be recycled it must be that size or larger for the paper mills to accept.

2. What happens to the paper after it is shredded?

The shredded paper is baled into bales weighing up to 1500 pounds. When 30 bales have been accumulated, one of the three paper mills that R&R uses sends their truck to take the paper to their mill. The paper is de-inked and processed into a liquid form and then recycled into various paper products such as toilet paper, brown paper towels, etc.

3. Does Richards & Richards send recycled paper overseas?

No. R&R only uses domestic paper mills so none of the paper goes overseas.

4. Do I have to remove staples before placing the paper in the security container?

No. It is not necessary to remove staples, rubber bands, or ACCO clips.

5. What about computer binders or 3-ring binders, do I have to remove the paper from the binder?

No. R&R will remove binders.

6. Can I put manila folders with pockets in the paper security bin?

Yes, all office paper can go into the security container.

7. What do I do if I throw something in the locked container by mistake?

Special care will need to be taken to assure nothing is placed into a secure container by mistake. Your department Records Officer will call Metro Records Management to open your security container only when absolutely necessary.

8. What do I do if my locked container is full?

Notify your department Records Officer.

9. Who do I contact if I need an extra pick-up?

Check with your departmental Records Officer to see when your next scheduled pick-up is. If necessary, the Records Officer (or possibly another departmental employee with Full Access security) can call for an extra pick-up.

10. What if I have extra material that needs to be picked up, can this be done on the scheduled route?

Yes. The material must be boxed with the word DESTROY clearly written on each box. The driver will list the additional boxes on the work order and have the designated authorized contact sign off on the work order. A separate per pound rate will be charged for this extra material. Unmarked material will not be picked up.

11. Can I put non-paper media such as microfiche, cassettes, discs, or CDs in the same container with the paper material?

No. Magnetic and electronic media must be in separate containers and clearly marked "Media Destruction." If it is a small amount it may be boxed with MEDIA DESTROY written on it. It should also be designated as Microfiche, or computer reels, or videotapes, etc. A separate per pound rate will be charged for this extra material. Unmarked material will not be picked up.

12. What if we are purging files from file cabinets?

The Records Officer (or possibly another departmental employee with Full Access security) can request delivery of one or more 96-gallon containers on wheels.

13. If I have Limited Access security, can I order additional service?

No. Check with your Records Officer, as all services must be ordered by a person in your department who has a Full Access security level.

Appendix A

Metro Secure Destruction Services Registration Form